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March 25, 2014

The Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Room 1220 South
Brooklyn, NY 11201


RE: Innovation Ventures, LLC, et al v. Ultimate One Distributing Corp., et al
Case No: 1:12-cv-05354-KAM-RLM
Our file no: C151-20733

Dear Judge Mann,

I am lead counsel for Capital Sales Company, a defendant and third-party plaintiff in the above matter. I am writing to respectfully request an extension of time in which to respond to the plaintiff's letter request seeking a protective order that was filed on March 20, 2014. I was out of town from March 19, 2014 through March 21, 2014. I wasn't able to obtain access to a copy of the motion through the court's ECF system. The motion was not available through the PACER system as well. I finally received a copy of the motion on March 25, 2014 by e-mail after requesting a copy from opposing counsel. I respectfully request an extension of time in which to file a response to the motion to March 27, 2014. Concurrence of opposing counsel in this request was granted.

Thank you.

Sincerely,


s/James K. Thome
James K. Thome

JKT/rls

Copy: All Counsel of Record via the Court's ECF System